

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	<u>STIPULATION AND ORDER</u>
UNITED STATES OF AMERICA	:	
	:	
-v.-	:	S1 18 Cr. 388 (ER)
	:	
ELIZABETH ANN PIERCE,	:	
	:	
Defendant.	:	
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WHEREAS, on or about August 20, 2018, ELIZABETH ANN PIERCE (the “Defendant”) was charged in a nine-count Superseding Indictment, S1 18 Cr. 388 (ER) (the “Indictment”), with wire fraud, in violation of Title 18, United States Code, Sections 1343 and 2 (Count One); and aggravated identity theft, in violation of Title 18, United States Code, Sections 1028A(a)(1), 1028A(b), and 2 (Counts Two through Nine);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), to any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense in Count One of the Indictment, including, *inter alia*, the following:

- a. Any and all ownership interests of the Defendant in Quintillion Holdings, LLC, and its subsidiaries; and
- b. Any and all ownership interests of the Defendant in Quintillion Subsea Holdings, LLC, and its subsidiaries.

WHEREAS, or about June 19, 2019, the Court entered a Preliminary Order of

Forfeiture as to Specific Property/Money Judgment (the "Preliminary Order") (D.E. 49), which ordered the forfeiture to the United States of, *inter alia*, to all right, title and interest of the Defendant in:

- a. Any and all ownership interests of the Defendant in Series A Preferred Units of QSH Parent Holdco, L.L.C.;
- b. Any and all ownership interests of the Defendant in Common Units of QSH Parent Holdco, L.L.C.; and
- c. Any and all ownership interests of the Defendant in shares of Quintillion, Inc.'s capital stock

(a. through c., collectively, the "Specific Property");

WHEREAS, the provisions of Title 21, United State Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, require publication of a notice of forfeiture and of the Government's intent to dispose of the Specific Property before the United States can have clear title to the Specific Property;

WHEREAS, the Notice of Forfeiture and the intent of the United States to dispose of, *inter alia*, the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov)) beginning on January 25, 2020, for thirty (30) consecutive days, through February 23, 2020, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions and proof of such publication was filed with the Clerk of the Court on May 1, 2023 (D.E. 58);

WHEREAS, in or about November 2017, Quintillion, through its attorney Richard D. Owens, Esq., advised the Government of Quintillion's potential interest in the Quintillion Shares;

WHEREAS, the Government, and Quintillion, by and through its attorney Richard D. Owens, Esq., wish to resolve this matter without further litigation;

IT IS HEREBY STIPULATED AND AGREED by and among the United States of America, by DAMIAN WILLIAMS, the United States Attorney for the Southern District of New York, Sarah Lai, Assistant United States Attorney, of counsel, and Quintillion, by and with the consent of its attorney, Richard D. Owens, Esq., that

1. The Government hereby acknowledges Quintillion's right, title and interest in the Specific Property, and the Government will not seek a Final Order of Forfeiture including the Specific Property.

2. Quintillion hereby agrees to waive all rights to appeal or otherwise challenge or contest the validity of this Stipulation and Order.


3. Each party to this Stipulation and Order shall bear its own costs and attorney's fees.

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4. This Stipulation and Order may be executed in counterparts, each of which shall be deemed an original, and all of which, when taken together, shall be deemed the complete Stipulation. Fax or PDF copies shall be treated as originals.

Dated: New York, New York  
May 15, 2023

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

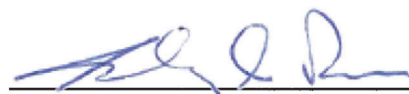
By:   
SARAH LAI  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, New York 10007  
Telephone: (212) 637-1944

5/16/2023  
DATE

Quintillion, Inc.  
By:   
RICHARD D. OWENS, ESQ  
Latham & Watkins LLP  
Attorney for Quintillion, Inc.,  
QH Parent Holdco, LLC and QSH Parent Holdco, LLC  
885 Third Avenue  
New York, NY 10022  
Tel: (212) 906-1200

5-15-23  
DATE

SO ORDERED:

  
HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE

6/28/2023  
DATE